REMARKS

Claims 1 - 37 remain active in this application.
Claims 1, 17 and 28 have been amended to emphasize
novel aspects of the invention already explicitly
recited therein and in an effort to avoid evident
confusion on the part of the Examiner. Support for the
amendments of the claims is found throughout the
application, particularly in the *profile table as
illustrated in Figure 14* and the description thereof on
pages 14, 19 - 20, 31, 36 and 42.   No new matter has
been introduced into the application.

Before proceeding to a discussion of the grounds
of rejection asserted in the present office action, it
is respectfully submitted that the principal issue in
this application is the failure of the Examiner to
fully appreciate the possibly subtle distinction of the
authorization architecture provided by the present
invention embodied in the profile table, in accordance
with the invention. The profile table essentially
provides an additional level of authorization
specification which, by avoiding references to user
authorizations (e.g. being independent of users) allows
major simplification of the authorization database,
facilitates the addition or deletion of resources and
users and changes of user authorizations by an
administrator and, perhaps most importantly, provides
much enhanced user convenience by allowing automation
of user authorization to particular resources,
including access level control from user authentication
at the level of the user list.

In accordance with the invention, profiles provide
a grouping of resources and a "shorthand" nomenclature
or reference thereto. While a profile could contain a
reference to only a single resource and could be needed
for all combinations of available resources, in
practice, the number of profiles will be very much

fewer than the number of available resources due to the
fact that a large number or resources will normally be
used in combination with other particular resources and
that a large number of users will have a need for the
same groups of resources, albeit at possibly different
access authorization levels (e.g. read only,
read/write, etc.). While such grouping may be provided
in some known systems, it is usually performed in
connection with authorizations for particular users
such that the access information contained in an access
authorization table will contain much more information
at a granularity of the individual users and individual
resources. This requires the access authorization
database to be very large and difficult to edit/update
as users and resources are added and deleted and access
authorizations and access level authorizations are
changed. Moreover, since there is a close connection
specified between the individual users and the
individual resources, the individual users must
generally authenticate themselves to each individual
resource as well as to the system. Thus, by providing
an additional level of access authorization
architecture which may have any arbitrary degree of
granularity suitable for the environment, the
authorization database is simplified to three tables
which are smaller, simpler and more easily edited by an
administrator and the updating of the authorization
system thus automated. Further, in accordance with the
additional level of architecture provided by the
profile table (which does not include any user
authorization reference and is thus independent of
users) once a given user has been authenticated at the
level of the user table, authentication of the user to
each resource may be accomplished in an automated
fashion by simply iterating through the resources in
each profile associated with the authenticated user *in
the user table* (Figure 13).

It is evident that the Examiner has not fully
understood this distinction since, in answer to the
previously submitted remarks, finds a contradiction and
asserts an admission from the statement that profiles
can be assigned to any user or plurality of users.
However, in context and as claimed those remarks refer
to profiles *as they are specified in the profile table
and that the associations with particular users are
made in the user table which is distinct from the
profile table*. Therefore, there is no contradiction
whatsoever between the profiles being specified
independently of users *in the profile table* and the
association for authorization being made *in the user
table*. With this clear and explicitly recited
distinction in mind, the grounds of rejection asserted
by the Examiner will be addressed.

Claims 1 - 37 have been rejected under 35 U.S.C.
§112, first paragraph, as failing to comply with the
written description requirement in regard to the
amendatory language: "independent of any user". This
ground of rejection is respectfully traversed as being
substantively in error and as being moot in view of the
amendments to claims 1, 17 and 28, above.

It was pointed out in the previous response that
support for such amendatory language is found in Figure
14 and on pages 14, 19 - 20, 31, 36 and 42. While it
is conceded that the word "independent" does not appear
in the originally filed specification, it is clear from
the profile table illustrated in Figure 14 that no
reference to any user authorizations appears therein
and the profiles, as specified in the profile table are
thus independent of any user, as explicitly recited.
The text of the referenced passages is also consistent
with the description of the profiles in the profile
table as being "independent" of any user. In
particular, page 42 contains a listing of information
specified in profiles as represented in the profile

table and which contains no reference to any user (and thus "independent of any user") while mentioning that conflicts between access mode for assets in more than one profile *assigned to a user* may be resolved in any of several ways. Therefore, while it is necessary that profiles be ultimately associated with a user, that association is not made in the profile table and the profile table and the profiles specified therein are, indeed, well-described as being "independent of any user".

Nevertheless, to expedite the prosecution of this application, the language questioned by the Examiner has been amended to clearly refer to the profiles "*in said list of profiles* containing no reference to any user authorization" which is clearly and fully supported by at least Figure 14 and the passage on page 42. Further, some other language in claims 1, 17 and 28 has been relocated as being, while in no way misdescriptive, possibly contributing to the Examiner's confusion.

Accordingly, it is respectfully submitted that this ground of rejection is substantively in error and, in any case, now moot in view of the alternative amendments made above which are clearly well-supported by the specification as originally filed and in compliance with the written description requirement of 35 U.S.C. §112. Accordingly, reconsideration and withdrawal of this ground of rejection is respectfully requested.

Claims 1 - 37 have also been rejected under 35 U.S.C. §102 as being anticipated by Ahlberg et al. and Hayes, Jr. These rejections are also respectfully traversed for the reasons of record and the further reason set out below. It is also respectfully submitted that the Examiner has not made a *prima facie* demonstration of anticipation of any claim based on Ahlberg et al. for the simple reason that the Examiner

has not addressed the amendatory recitation upon which the above rejection under 35 U.S.C. §112 was based. In regard to the rejection based on Hayes, Jr., appearing without comment on page 7 of the present action, it is respectfully pointed out that this ground of rejection is expressly withdrawn by the Examiner on page 2 of the same action. Therefore, it is believed that the rejection based on Hayes, Jr. is in error and need not be further discussed.

The invention, as claimed has been described above and in previous responses. In the response filed December 12, 2003, Ahlberg et al. and Hayes, Jr. were described as follows:

"In contrast to the invention, as claimed, Ahlberg et al. is directed to order entry for Internet accessible resources which may be made available as an arbitrary suite of resources. It is not clear that Ahlberg et al. teaches (or suggests) a list of such resources or a list of users but does not appear to teach (or suggest) editing of either, as claimed in claims 1 and 28. Also, while Ahlberg et al. refers to a user, customer or security "profile", there is little, if any, indication of what it contains beyond the information required in the dialog screen of Figure 20 and none of the references to such a profile appear to teach or suggest use or function of the profile to group particular resources. Further, and more importantly, while suites of resources may be provided and particular suites may be ordered by or accessible to particular users, there is no teaching (or suggestion) in Ahlberg et al. of editing a profile to add or delete a profile corresponding to at least one resource

(claims 1 and 28) or to correlate the resources with users by one or more profiles as an intermediate reference level (claim 17), particularly in Figure 20 and/or the passages relied upon by the Examiner. Therefore, it is clear that no claim in the application is anticipated by Ahlberg et al. and the Examiner has not made a *prima facie* demonstration of how Ahlberg et al. answers the recitations of any claim.

"Similarly, in Hayes, Jr. and Broomhall et al., the nature and use of profiles is much different than in the present invention, as claimed. More specifically, Hayes, Jr. is directed to use of user profiles specifying user preferences in regard to application configuration such that a user may log-in to the system from any terminal and have the accessed application reconfigured in accordance with the user's preferences without requiring the administrator to terminate and re-launch the application. The passages of Broomhall et al. cited by the Examiner, particular in column 3, appear to be directed simply to manipulations of passwords and UserIDs. There is no teaching (or suggestion) seen in either reference of providing grouping of resources and associating users with resources by groups through the use of one or more profiles, as claimed or listing users, resources or profiles and/or editing of any such list. Therefore, Hayes. Jr. does not anticipate any claim in the application and the Examiner has not made a *prima facie* demonstration that Hayes, Jr. answers the recitations of any claim in the application."

Further, in the response filed March 29, 2004, the Hayes, Jr. and Ahlberg et al. references were summarized as follows:

"In the access authorization arrangements of the prior art such as the system of Ahlberg et al. or Hayes, Jr., both of which are discussed in detail in the previous response which is hereby fully incorporated by reference, a profile is defined in conjunction with a given user. In other words, the respective profiles of the prior art including Ahlberg et al. and Hayes, Jr., contain a userID, access level and resources (and possibly other user-associated information such as user preferences) and a profile thus defined is a "user profile", "user security profile" or "client profile management". See, for example, column 15, line 10 of Ahlberg et al. as well as all the passages noted by the Examiner in which references to "profile" are associated with specific users or customers. The same is true for Figure 24 and the passage of column 7 of Hayes, Jr., relied on by the Examiner (note also "client profile management" at column 4, lines 15 - 16; the first sentence of the summary of the invention). Moreover, the Examiner's statement of the rejections clearly indicates the association of a profile with a particular user.

"Therefore, the Examiner has not demonstrated how either Ahlberg et al. or Hayes, Jr., answers the recitations of three separate lists of resources, profiles and users, each constituted as claimed, or separate steps of editing thereof. That is, the Examiner has not shown Ahlberg et al. or

Hayes et al. to teach or otherwise answer the recitation of a user list *containing*, for each user, at least one profile while each profile *contains* at least one resource. Rather, the user lists of Ahlberg et al. and Hayes, Jr. *are* the profiles of the respective users or terminals or groups of users or terminals. Therefore, by acknowledging the formation of profiles in regard to users in the respective statements of the rejections, the Examiner has failed to make a *prima facie* demonstration of anticipation of any claim in the application and has glossed over or substantially ignored clearly recited features and basic concept of the invention in the definition and existence of profiles separate and distinct from entries in a user list as illustrated in the profile list of Figure 14 (which contains no reference to users) and referenced by the user list of Figure 13; which features and principle support the meritorious effects of the invention."

The Examiner again appears to admit in the present statement of the rejection based on Ahlberg et al. that the profiles in Ahlberg et al. are associated with users or at least appears to gloss over or ignore the distinction represented by the claim recitation that the profiles the in editable profile list are "independent of any user". On the contrary, it appears that profiles in Ahlberg et al. (or Hayes, Jr.) are security profiles or user profiles or the like, necessarily related to users and contrary to the explicit recitations of the claims as presently rejected and as now amended. Therefore, it is clear that the Examiner has not, in fact, made a *prima facie* demonstration of anticipation of any claim but, rather,

has used a substantively erroneous rejection under 35
U.S.C. §112 to buttress a clearly improper rejection
which the reference(s) relied upon clearly does not
support. In other words, the Examiner has sought to
justify ignoring or according no weight to explicit
recitations of the claims which is clearly improper in
a rejection for anticipation by incorrectly and without
substantive basis asserting deficiency of the written
description. It is respectfully submitted that such a
rationale does not provide support or color of
propriety for either ground of rejection but
underscores the error implicit in both. Therefore,
particularly in view of the amendments to claims 1, 17
and 28 removing a possible basis for the Examiner's
confusion, discussed above, and rendering the rejection
under 35 U.S.C. §112 moot, it is clear that neither
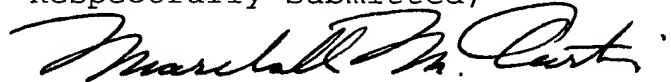rejection remains tenable.

Accordingly, it is respectfully submitted that the
rejection based on Ahlberg et al. (as well as that
based on Hayes, Jr., if still asserted notwithstanding
the explicit withdrawal thereof) are clearly in error
and the claimed subject matter is just as clearly
patentably distinguished therefrom. Therefore,
reconsideration and withdrawal of the rejection based
on Ahlberg et al. (and Hayes, Jr.) are respectfully
requested.

Since all rejections, objections and requirements
contained in the outstanding official action have been
fully answered and shown to be in error and/or
inapplicable to the present claims, it is respectfully
submitted that reconsideration is now in order under
the provisions of 37 C.F.R. §1.111(b) and such
reconsideration is respectfully requested. Upon
reconsideration, it is also respectfully submitted that
this application is in condition for allowance and such
action is therefore respectfully requested.

If an extension of time is required for this

response to be considered as being timely filed, a
conditional petition is hereby made for such extension
of time. Please charge any deficiencies in fees and
credit any overpayment of fees to Deposit Account No.
09-0458 of International Business Machines Corporation
(E Fishkill).

Respectfully submitted,

Marshall M. Curtis
Reg. No. 33,138

Whitham, Curtis & Christofferson, P. C.
11491 Sunset Hills Road, Suite 340
Reston, Virginia 20190
(703) 787-9400   Customer Number: **30743**